

REMARKS

Claims 1-22 and 30-34 are pending. Applicants respectfully request reconsideration of the application in view of the following remarks submitted in support thereof.

Rejections under 35 U.S.C. § 102:

Claims 1, 11, 17, and 21 were rejected under 103 as being obvious in view of Dellacona Coates and Neal. This rejection is respectfully traversed.


Claims 1, 11, 17 and 21 include the feature of generating an external queue pair (QP) for establishing communication between the L4 router and an external host through a reliable connection (RC) session, and generating internal queue pairs, one of the internal queue pairs being coupled with the external queue pair, the internal queue pairs establishing communications between the at least two controllers and an internal target device, between the L4 router circuitry and the at least two controllers, and between the L4 router circuitry and the internal target device by using reliable datagram (RD) sessions. Furthermore, claims 1, 11, 17 and 21 use a reliable datagram (RD) connection between the internal queue pairs and the internal device controller, while a reliable connection (RC) is used between the router and the external host. That is, different connection types are provided for the architecture. Nowhere does Dellacona, Coates or Neal refer to these features.

The Examiner acknowledges that Dellacona fails to disclose using an external queue pair and an internal queue pair to establish communication between two controllers and an internal target device through a reliable connection session. In asserting that Neal discloses this feature, the Examiner refers to column 3, lines 17-29, without providing any analysis whatsoever. Column 3, lines 17-29 contain the brief description for Figures 5-10. Neal describes host consumer processes talking to devices using RD, and nowhere does Neal suggest a host using RC communications with external queue pairs, and an RD connection for

internal queue pairs and an internal device, as claimed by Applicant. Neal specifies that the invention describes how SAN RD QPs can be associated with one or more EEC at the local HCA (See column 10, lines 19-24 and 58-60). Furthermore, there is no suggestion in Neal, nor any of the other cited references of mixing RC and RD communications and directing them at the router, as claimed. Neal is strictly limited to RD connections. Applicants respectfully request that the Examiner specify where combining the RC and RD connections are disclosed, as claimed in claims 1, 11, 17 and 21, in Neal or any of the other references, rather than a citation to the brief description of the drawings without providing any analysis. Applicants further request that the Examiner provide articulated reasoning to support the conclusory statement that Neal discloses the above mentioned feature so that the Applicants may refute this reasoning on Appeal, if this rejection is maintained.

A Notice of Allowance is respectfully requested. If the Examiner has any questions concerning the present Amendment, the Examiner is kindly requested to contact the undersigned at (408) 774-6921. If any other fees are due in connection with filing this Amendment, the Commissioner is also authorized to charge Deposit Account No. 50-0805 (Order No. ADAPP237).

Respectfully submitted,
MARTINE PENILLA & GENCARELLA, LLP



Michael L. Gencarella, Esq.
Reg. No. 44,703

710 Lakeway Drive, Suite 200
Sunnyvale, CA 94085
Telephone: (408) 749-6900
Facsimile: (408) 749-6901
Customer No. 25920